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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 LAUREN DAVIS, on behalf of herself and
others similarly situated,

14 *Plaintiff,*

15 v.

16 BOARD SI, INC.,

17 *Defendant.*

Case No. 2:24-cv-02300-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR DEFENDANT
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

(Second Request)

19 Pursuant to Fed. R. Civ. P. 6(b)(1)(A), LR 7-1, LR IA 6-1, and LR IA 6-2, Plaintiff Lauren
20 Davis, on behalf of herself and others similarly situated ("Plaintiff"), and Defendant Boardsi, Inc.
21 ("Defendant") (collectively, the "Parties), by and through undersigned counsel, respectfully
22 stipulate and agree and jointly move the Court for an Order extending the deadline for Defendant
23 to respond to Plaintiff's Complaint (ECF No. 1, "Complaint") in this matter, to and including May
24 16, 2025. In support thereof, Plaintiff and Defendant further state and agree as follows:

- 25 1. Plaintiff filed her Complaint in this matter on December 11, 2024.
- 26 2. Defendant executed a waiver of service of process on January 16, 2025 (ECF No.
- 27 13). By operation of Fed. R. Civ. P. 4(d)(3), therefore, the Defendant's response to the Complaint
- 28 was initially due on March 17, 2025.

1 3. On March 13, 2025, the Parties filed a Stipulation to Extend Defendant's Time to
2 Respond to the Complaint, which the Court granted on March 14, 2025, making April 16, 2025 the
3 new deadline for Defendant to answer, move, or otherwise respond to Plaintiff's Complaint. *See*
4 ECF No. 18.

5 4. Since the previous extension, the Parties have been exploring a potential extra-
6 judicial resolution, which may obviate the need for Defendant to respond to the Complaint
7 altogether if fruitful. Those discussions have been productive and are ongoing but are not yet
8 complete. As such, Defendant seeks a modest additional extension so the Parties can see those
9 discussions through to their natural conclusion without incurring litigation costs or burdening the
10 Court.

11 5. Defendant's counsel also needs additional time to thoroughly investigate the claims
12 at issue, to continue their discussions regarding a possible resolution, and to formulate a sufficient
13 responsive pleading, as needed, due to personal hardship, including a death in the family and
14 COVID-19 illness.

15 6. Counsel for the parties met and conferred on April 2, 2025, via telephone, regarding
16 extending the foregoing deadline. Plaintiff agreed to grant Defendant an extension of not less than
17 thirty (30) days. By operation of Fed. R. Civ. P. 6(a)(1) & (5), therefore, Defendant's new deadline
18 to file its response to the Complaint, if approved by the Court, would be on May 16, 2025.

19 7. This is the Parties' second request for an extension of this deadline. It is not made
20 for purposes of delay and would not prejudice any party.

21 8. By this requested extension, Defendant is not waiving any objections or defenses to
22 the Complaint available under applicable law, and the parties have agreed to be bound by its terms
23 pending the Court's approval and entry of same.

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1 WHEREFORE, for all of the reasons above, the parties stipulate and respectfully request
2 that the Court enter this order extending the Defendant's deadline to respond to the Complaint by
3 a period of no less than thirty (30) days, to and including May 16, 2025, along with granting all
4 other relief the Court deems just and proper.

5 Dated: April 9, 2025

Dated: April 9, 2025

6 CLOSE LAW GROUP

KIND LAW

7 By: /s/ Jason A. Close

By: /s/ Michael Kind (w/ Permission)

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11 **NO FURTHER EXTENSIONS**
12 **WILL BE GRANTED.**

IT IS SO ORDERED:

13 
UNITED STATES MAGISTRATE JUDGE

DATED: April 10, 2025

14 Respectfully Submitted by:

15 CLOSE LAW GROUP

16 /s/ Jason A. Close

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